

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

In re *Ex Parte* Application of James T. H. Deaver, as EXECUTOR OF THE ESTATE OF BRENT SIKKEMA, deceased, pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings )  
)  
) Case No. \_\_\_\_\_  
)  
)  
)

**DECLARATION OF GONZALO S. ZEBALLOS IN SUPPORT OF THE PETITIONER'S  
EX PARTE APPLICATION FOR AN ORDER TO CONDUCT DISCOVERY FOR USE IN  
FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. § 1782**

GONZALO S. ZEBALLOS hereby declares as follows:

1. I am a member of the New York Bar and a partner at Baker & Hostetler LLP, and represent Petitioner in this Application for an Order to Conduct Discovery for Use in Foreign Proceedings pursuant to 28 U.S.C. § 1782 (the "**Application**").
2. This Application shall seek discovery from The Western Union Company, Charter Communications, Inc., Google LLC, and Yahoo Inc., which are located in this District.
3. The Western Union Company is incorporated in this District. Attached hereto as **Exhibit A** is a true and correct copy of records maintained by the Delaware Department of State: Division of Corporations reflecting The Western Union Company's incorporation status.
4. Charter Communications, Inc. is incorporated in this District. Attached hereto as **Exhibit B** is a true and correct copy of records maintained by the Delaware Department of State: Division of Corporations reflecting Charter Communications, Inc.'s incorporation status.
5. Google LLC is incorporated in this District. Attached hereto as **Exhibit C** is a true and correct copy of records maintained by the Delaware Department of State: Division of Corporations reflecting Google LLC's incorporation status.
6. Yahoo Inc. is incorporated in this District. Attached hereto as **Exhibit D** is a true and

correct copy of records maintained by the Delaware Department of State: Division of Corporations reflecting Yahoo Inc.'s incorporation status.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: January 9, 2025  
New York, New York

/s/ Gonzalo S. Zeballos  
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